

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,)
in his capacity as the)
TRUSTEE FOR NATURAL RESOURCES)
FOR THE STATE OF OKLAHOMA,)

Plaintiff,)

vs.)

4:05-CV-00329-TCK-SAJ

TYSON FOODS, INC., et al,)

Defendants.)

- - - - -
THE VIDEOTAPED DEPOSITION OF
ANTHONY LAWRENCE, produced as a witness on behalf
of the Defendants in the above styled and numbered
cause, taken on the 9th day of October, 2007, in the
City of Muskogee, County of Muskogee, State of
Oklahoma, before me, Lisa A. Steinmeyer, a Certified
Shorthand Reporter, duly certified under and by
virtue of the laws of the State of Oklahoma.

A P P E A R A N C E S

FOR THE PLAINTIFFS: Mr. Robert Nance
Attorney at Law
5801 Broadway Extension
Oklahoma City, OK 73118
-and-
Ms. Holly Hillerman
Attorney at Law
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Tulsa, ok 74119

FOR CARGILL: Ms. Carlye Jimerson
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FOR SIMMONS FOODS: Mr. Josh Wisley
Attorney at Law
211 East Dickson Street
Fayetteville, AR 72701

FOR PETERSON FARMS: Ms. Nicole Longwell
Attorney at Law
320 South Boston
Suite 700
Tulsa, OK 74103

FOR GEORGE'S: Ms. Jennifer Lloyd
Attorney at Law
221 North College
Fayetteville, AR 72701

1 Q And it tells you that for this particular
2 farm, the paragraph following that says soil samples
3 for Fields 1 and 3 were taken in November 2003 and
4 tested for nutrient content at the Oklahoma State
5 University Soil, Water and Forage Analytical 02:21PM
6 Laboratory in Stillwater, Oklahoma. It says the
7 test revealed that Field 1 has a moderate P index
8 and can have the full rate of animal waste applied;
9 correct?

10 A Yes. 02:21PM

11 Q And what is that; what's the full rate for
12 Field 1?

13 A Full rate would be two ton to the acre.

14 Q Okay, and then Field 2 has shown to have a low
15 P index rating and can also have full rate of animal 02:21PM
16 waste applied?

17 A Right.

18 Q So with regards to Field 1, the P index --

19 A Let me back up. A full rate would be four ton
20 to the acre. 02:22PM

21 Q Okay. Is that what this plan says for this
22 particular grower to apply?

23 A No. We're basing it on 3.8 tons to the acre
24 down there is what we're -- it's just a little under
25 four. 02:22PM